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March 16, 2017

By UPS Overnight

Jean-Claude Mazzola Messner Reeves, LLP 805 Third Avenue, 18th Floor New York, New York 10022

Re:

Jeniece Ilkowitz, et al. v. Michael Durand, et al.

Case No. 1:17-CV-00773-PGG

U.S. District Court, Southern District of New York

Dear Mr. Mazzola:

You stated that you are an expert in title insurance. That you have represented Lloyd's of London and other larger insurers throughout your career. Despite your professed knowledge of title insurance you insist on bringing this frivolous lead-based claim against my client.

In the case that you need further instruction on title insurance, I am including a copy of the book I wrote entitled *Finding the Uncommon Deal*. Please see chapter 17 which discusses title insurance.

Very truly yours,

Adam Leitman Bailey